

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 18, 2019
2. Name of company(s) covered by this certification: Reservation Telephone Cooperative
3. Form 499 Filer ID: 803115
4. Name of signatory: Shane D. Hart
5. Title of signatory: CEO/General Manager
6. Certification:

I, Shane D. Hart, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

Attachments: Accompanying Statement explaining CPNI procedures

RESERVATION TELEPHONE COOPERATIVE
STATEMENT OF COMPLIANCE and PROCEDURES
For the Year Ending 2018
Form 499 Filer ID: 803115

1. This Statement of Compliance for Reservation Telephone Cooperative ("Reservation" or "the Cooperative") is attached to and referenced within the Cooperative's 2018 Annual CPNI Certification.
2. Reservation has conducted CPNI training for all its employees with special emphasis training for any employee that has access to CPNI. All employees have acknowledged their understanding of the requirements for the safeguarding of CPNI and the disciplinary actions that will be taken for the unauthorized access, breach, release, or usage of CPNI.
3. The Cooperative has and maintains copies of the FCC's CPNI Rules in addition to its own internal CPNI Policies and Guidelines (CPNI Manual). The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and acknowledged by all Cooperative employees.
4. For the year ending 2018, Reservation is not aware of any incidence involving the access, breach, release or usage of its CPNI by any unauthorized person or entity; i.e., data brokers or pretexters.
5. For the year ending 2018, Reservation has not received any customer complaints concerning the unauthorized access, breach, release or usage of CPNI.